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**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF UTAH, CENTRAL DIVISION**

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**BLUERIBBON COALITION *et al.* and  
STATE OF UTAH *et al.*,**

Plaintiffs,

v.

**U.S. BUREAU OF LAND  
MANAGEMENT, *et al.*,**

Defendants,

and

**SOUTHERN UTAH WILDERNESS  
ALLIANCE,**

Defendant-Intervenor.

Case Nos. 2:23-cv-00923-DAK-JCB (lead)  
4:24-cv-00046-DAK-JCB

**DEFENDANT-INTERVENOR'S  
RESPONSE TO PLAINTIFFS'  
COMPLAINT**

District Judge Dale A. Kimball  
Magistrate Judge Jared C. Bennett

Pursuant to DUCivR 7-4(b)(2), Defendant-Intervenor Southern Utah Wilderness Alliance (SUWA) submits this response to Plaintiffs State of Utah *et al.*'s First Amended Complaint (ECF No. 70).

The Bureau of Land Management's decision and agency action to approve the Labyrinth Rims/Gemini Bridges Travel Management Plan (TMP) is supported by substantial evidence and is not arbitrary and capricious. Therefore, the Court should uphold the Labyrinth Rims/Gemini Bridges TMP in its entirety.

Additionally, SUWA raises the following affirmative defenses:

1. Plaintiffs fail to state a claim upon which relief may be granted for all or some of the claims in the Complaint;
2. All or some of Plaintiffs' claims in the Complaint are not ripe;
3. Plaintiffs' lack subject matter jurisdiction for all or some of the claims in the Complaint;

Respectfully Submitted September 6, 2024.

/s/ Hanna Larsen  
Hanna Larsen  
Stephen Bloch  
Laura Peterson

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